

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10059-DPW
)	
CHAD BENJAMIN,)	
)	
Defendant.)	

**ASSENTED-TO-MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE
GOVERNMENT'S OPPOSITION TO DEFENDANT'S MOTION TO SUPPRESS**

The government respectfully moves for a thirty (30) day extension of time within which to file its opposition to the defendant's motion to suppress evidence. The government's opposition is presently required to be filed on October 13, 2005. The government, however, requests an extension from the applicable time requirements, until November 14, 2005, to file its response.

As grounds therefor, the government states the following:

1. The undersigned assistant U.S. attorney needs the additional time to file its opposition due to a heavy trial preparation schedule for two back-to-back trials scheduled for the week of October 31st (Tauro, J.) and the week of November 14th (Saris, J.), other memoranda and brief writing, evidentiary hearings, an on-going heavy workload, and other more immediate pressing matters requiring the undersigned's attention.

2. A hearing on the motion to suppress is presently scheduled for December 8, 2005. And, therefore, the defendant is in no way prejudiced by the granting of the extension requested.

3. Counsel for the defendant has given his assent to the government's request for extension of time.

WHEREFORE, the government respectfully requests that the Court grant it **until November 14, 2005** to file its opposition to the defendant's motion to suppress evidence.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney

Date: October 9, 2005

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
October 9, 2005

I, Antoinette E.M. Leoney, Assistant U.S. Attorney, certify that I caused a copy of the foregoing to be served by electronic court filing notice to Kevin J. Reddington, Esq., Law Offices of Kevin J. Reddington, Williamsburg Square, Suite 203, 1342 Belmont Street, Brockton, MA 02301.

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney